

The Ruckdeschel Law Firm, LLC

8357 Main Street
Ellicott City, Maryland 21043
Telephone: (410) 750.7825
Facsimile: (443) 583.0430

December 10, 2015

VIA Electronic Submission FOIAonline

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460

RE: FREEDOM OF INFORMATION ACT REQUEST

Dear Sir or Madam:

I am writing as an attorney on behalf of one of my clients, Mrs. Sandra Berge who is the personal representative of Mr. Henry G. Berge III.

To that end, I am seeking the following:

Records Requested

1. All records and information regarding any importation of products into the United States, including but not limited to copies of EPA Form 3520-1, from January 1980 thru the present by the following entities:

Akebono Brake Industry Co., Ltd.
Akebono Member Corporation
Akebono Brake Corporation
Akebono Corporation (North America)
Akebono Corporation
Akebono America, Inc.

AMAK Brake, LLC
AMBRAKE Manufacturing, Ltd.
AMBRAKE, GP
AMTEC Brake, LLC

2. All records and information regarding any importation of products manufactured by the following entities into the United States, including but not limited to copies of EPA Form 3520-1, from January 1980 thru the present:

Akebono Brake Industry Co., Ltd.
Akebono Member Corporation
Akebono Brake Corporation
Akebono Corporation (North America)
Akebono Corporation
Akebono America, Inc.

AMAK Brake, LLC
AMBRAKE Manufacturing, Ltd.
AMBRAKE, GP
AMTEC Brake, LLC

Please note that the extent of these requests is *only* to discover information to further Mrs. Berge's personal injury lawsuit. To the extent that any portion of these requests seeks information that you deem confidential, please notify me immediately.

I understand that there will be charges for locating and copying these materials and agree to pay up to \$100.00 in such charges without further consultation with your office. If you anticipate charges will exceed \$100.00, please contact me.

If you should have any questions or require any additional information, please do not hesitate to contact me at 410-750-7825, or via email at horvat@rucklawfirm.com. Thank you in advance for your cooperation in this matter.

Very truly yours,

Z. Steven Horvat